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Attorney for Plaintiff
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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ANESTI MARKOGLU
Plaintiff,

vs.

Case No.: 15-cv-07508-SDW-LDW

EXPERIAN CORPORATION
MicroBilt Corporation
Federated Capital Corp.,
Defendants.

X

CERTIFICATION IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL

1. This Certification is submitted in support of my motion for leave to withdraw as Plaintiff's attorney and charging lien against the Plaintiff for attorney's fees and costs incurred in the minimal amount of \$1,000.00.

2. I am required by the Rules of professional responsibility and of this Court to withdraw as Plaintiff's attorney due to Plaintiff's representation concerning the background of his case.

3. Without prejudicing Plaintiff, this application is made before any discovery is due or responses to motions are due so that Plaintiff may obtain counsel to continue his case.

4. During the prosecution of this case, it became apparent that Plaintiff had appealed a judgment against him and because he did not supply the Appellate Court with the transcript and record below, the Appellate Court affirmed a judgment against him.

Had I known this fact, I would not have filed this case. My continued representation of the Plaintiff would violate the Rules of this Court and the Disciplinary Rules.

5. I respectfully request that this Court permit my withdrawal as Plaintiff's attorney in this matter.

7. Continued representation of this Plaintiff will result in violations of the Disciplinary Code.

8. I also request that a charging lien be imposed on the file in the amount \$1,000.00 for the cost of the filing fee, drafting the complaint and serving the same on all defendants.

9. No prior application has been made for the same relief.

WHEREFORE, I respectfully requests an Order: granting my withdrawal as Plaintiff's attorney; judgment in the amount of \$1,000.00; charging lien on Plaintiff's file; sealing the application and precluding any Defendant or their counsel and/or agents and any other party from reviewing and/or obtaining a copy of the motions, including supporting, opposing and/or reply papers submitted by Shmuel Klein, Plaintiff and/or anyone acting on Plaintiff's behalf; granting costs and disbursements incurred, as well as such other and further relief as may be just, proper and equitable.

I, Shmuel Klein I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: December 16, 2015
Mahwah, NJ

/s/ Shmuel Klein
Shmuel Klein